

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

DOLORES CEPEDA,)	
)	
Plaintiff,)	
)	
v.)	
)	
BANK OF AMERICA, N.A.,)	C.A. No. 1:19-cv-00005-WES-PAS
FAY SERVICING, LLC,)	
WILMINGTON TRUST NATIONAL)	
ASSOCIATION SOLELY AS TRUSTEE)	
FOR THE MFRA TRUST 2014-2, ALIAS)	
)	
Defendants.)	
)	

DEFENDANT BANK OF AMERICA, N.A.'S
MOTION TO DISMISS THE COMPLAINT

Pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, Defendant Bank of America, N.A., through its undersigned counsel, respectfully requests that the Court dismiss in its entirety and with prejudice the Complaint filed by Plaintiff Dolores Cepeda for failure, as a matter of law, to state any cognizable claim for relief.

Support for the above request is provided in Bank of America, N.A.'s accompanying memorandum of law.

Date: June 18, 2019

Respectfully submitted,

BANK OF AMERICA, N.A.,
Defendant,

By its attorneys,

/s/ Justin J. Shireman

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CERTIFICATE OF SERVICE

I, Justin J. Shireman, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF), and paper copies will be sent to those indicated as non-registered participants on June 18, 2019.

/s/ Justin J. Shireman
Justin J. Shireman